biotransform under aerobic conditions but not under anaerobic conditions such as currently proposed for the Site. (AECOM /Arcadis NEWMOA webinar presentation November 11, 2016.)

Additional comments on AFs proposal for Enhanced Bioremediation provided by Dr. Dan Pope of CSS-Dynamac are also attached. Our joint agency technical team continues to conclude that AFs termination of the SEE system was premature, and AFs proposal for Enhanced Bioremediation is also premature and not ready to implement, given the substantial considerations and data gaps we have outlined above.

We look forward to further discussing these concerns with the AF and working together to determine the most expeditious and cost effective approach to complete the remedy for ST12.

Sincerely,

Carolyn d'Almeida Remedial Project Manager, EPA Wayne Miller

Remedial Project Manager, ADEQ

cc: Ardis Dickey, AFCEC

Attachments